

Re: MEF v. Barbounis

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Seth Carson &lt;seth@dereksmithlaw.com&gt;

Wed 10/13/2021 9:21 AM

**To:** Bill Rieser;**Cc:** Sidney Gold;

You replied on 10/13/2021 9:47 AM.

If your client wants something from me than counsel them to stop acting in the way that led them to consider filing a motion for sanctions.

There is no reason to file MSJs under seal.

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**From:** Seth Carson <seth@dereksmithlaw.com>  
**Sent:** Wednesday, October 13, 2021 9:17:53 AM  
**To:** Bill Rieser <brieser@discrimlaw.net>  
**Cc:** Sidney Gold <sgold@discrimlaw.net>  
**Subject:** Re: MEF v. Barbounis

No

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**From:** Bill Rieser <brieser@discrimlaw.net>  
**Sent:** Wednesday, October 13, 2021 9:17:07 AM  
**To:** Seth Carson <seth@dereksmithlaw.com>  
**Cc:** Sidney Gold <sgold@discrimlaw.net>  
**Subject:** MEF v. Barbounis

Seth,

Will you stipulate to a motion for the parties to file their MSJ papers and exhibits under seal?

Thanks